

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWSON PRODUCTS, INC.,

Plaintiff,

v.

DONALD CONNER, WILLIAM PRICE,  
PATRICK BYRON, MIKE MYERS, SHANE  
PATTERSON, GREG GARDNER, JAMES  
GOEBEL, STEVEN MARKOWITZ,  
CAMILLE WATKINS,

Defendants.

Case No. 1:23-cv-16843

**DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADINGS**

COME NOW Defendants Donald Conner, William Price, Patrick Byron, Mike Myers, Shane Patterson, Greg Gardner, James Goebel, Steven Markowitz, and Camille Watkins (collectively, the "Defendants"), by and through the undersigned counsel, and respectfully move the Court for an extension of time through and including **July 8, 2024**, for the Defendants to answer or otherwise respond to the Complaint filed by Plaintiff Lawson Products, Inc. (the "Plaintiff" or "Lawson"). Counsel for Lawson consents to the requested extension.

In support of this Motion, the Defendants state the following:

1. On or about December 15, 2023, Lawson filed its Complaint against the Defendants in this Court.
2. Counsel for the Defendants accepted electronic service of the Complaint on January 3, 2024.

3. The parties were engaged in settlement discussions prior to Lawson filing the Complaint. Those discussions have continued in recent months.

4. On March 20, 2024, the Court extended the deadline for the Defendants to respond to the Complaint to April 30 to allow settlement discussions to continue. Doc. 20.

5. Since the Court granted the extension, the Parties have continued to engage in settlement discussions and are in the process of a pre-discovery exchange of data to facilitate a settlement.

6. Furthermore, the Parties have conferred and now agreed to have The Hon. James R. Epstein serve as mediator proceeding to be held between the Parties, which is confirmed to take place in Chicago, Illinois on June 20, 2024.

7. Given that the Parties have mutually agreed to mediate, settled upon a mediator, and confirmed that the mediation will take place on June 20, they respectfully request and extension of the deadline imposed by the Court to allow the June 20 mediation proceedings to be completed.

8. Specifically, the Defendants request that their deadline to answer or otherwise respond to the Complaint be extended through and including **July 8, 2024**, to file with the Court either 1) the Defendants' responsive pleading; or 2) an appropriate notice or stipulation of dismissal.

9. This Motion is made in good faith, not for the purpose of delaying these proceedings. The requested extension will permit the Parties to determine if a settlement of this matter can be achieved via mediation, without further Court involvement. A Proposed Order is being submitted contemporaneously herewith.

10. Counsel for the Defendants has conferred with Lawson's counsel regarding this Motion, and Lawson consents to the requested extension.

WHEREFORE, the Defendants respectfully pray for entry of an Order in the above-captioned proceeding, extending the time for it to answer or otherwise respond to the Complaint in this action, through and including **July 8, 2024**.

This 29<sup>th</sup> day of April, 2024.

/s/ David B. Ritter

David Ritter (IL Bar No. 6190040)

John M. Moyer (*Pro Hac Vice* application pending)

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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

This is to certify that on the 29<sup>th</sup> day of April, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

Richard T. Kienzler  
Colton D. Long  
Littler Mendelson, P.C.  
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*Counsel for Lawson Products, Inc.*

/s/ David B. Ritter

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